From: Robert Werner
To: Barbara Nann

Cc: <u>lister.melody@epa.gov; Stephen Tzhone</u>

Subject: San Jacinto River Waste Pits (06ZQ) - Concerning the Site map created Sept. 29, 2009 - Re: Fw: San Jacinto: Info Needed for UAO

Enforcement Record 09/30/2009 12:28 PM

Attachments: Preliminary Perimeter allSamples.pdf

Letter - IPC - Special Notice Letter - 2009-06-24 - Enclosure 2 - Preliminary Boundary Illustration (highlights north & south waste pit

areas) -- 2009-06-11.pdf

Letter - IPC - Special Notice Letter - 2009-07-09 - Enclosure 2 - Preliminary Boundary Illustration (no reference to southern waste pit) -

2009-07-08.pdf

Barbara,

Date:

RE: Suggested deletion of the highlighted waste pit area on the south side of I-10 from Site map created Sept. 29, 2009, that you want me to put into SDMS.

The Site map created Sept. 29, 2009, attached to Jeff's below 09/29/2009 12:00 PM email, illustrates:

- 1. The Site's preliminary boundary.
- 2. The highlighted McGinnes 20-acre property on the north side of I-10.
- 3. The highlighted waste pit area on the south side of I-10.
- 4. Sample locations within the Site's preliminary boundary.

The highlighted <u>waste pit area on the south side of I-10</u> was deleted from the June 11, 2009, Site map that we'd originally planned for enclosure with the IPC and MIMC Special Notice Letters. Therefore, the <u>waste pit area on the south side of I-10</u> does not appear in the updated July 8, 2009, Site maps enclosed with the July 17, 2009, Special Notice Letters that were sent to IPC (SDMS # 871012) and MIMC (SDMS # 871015).

The following is the original Site map that was created June 11, 2009. This map illustrates:

- 1. The Site's preliminary boundary.
- 2. The highlighted McGinnes 20-acre property on the north side of I-10.
- 3. The highlighted waste pit area on the south side of I-10.



Letter - IPC - Special Notice Letter - 2009-06-24 - Enclosure 2 - Preliminary Boundary Illustration (highlights north & south waste pit areas) -- 2009-06-11.pdf

The following is the updated July 8, 2009, Site map that was enclosed with the IPA and MIMC Special Notice Letters. This map illustrates only:

- 1. The Site's preliminary boundary.
- 2. The highlighted McGinnes 20-acre property on the north side of I-10.



Letter - IPC - Special Notice Letter - 2009-07-09 - Enclosure 2 - Preliminary Boundary Illustration (no reference to southern waste pit) -- 2009-07-08.pdf

For uniformity sake, I recommend the below Sept. 29, 2009, Site map be replaced with a new map that also excludes the <u>waste pit area on the south side of I-10</u>. The new Site map will then illustrate the same features that appeared on the July 8, 2009, Site map **plus** sample locations within the Site's preliminary perimeter. This map will illustrate:

- 1. The Site's preliminary boundary.
- 2. The highlighted McGinnes 20-acre property on the north side of I-10.
- 3. Sample locations within the Site's preliminary boundary.

If you agree, Melody can make a new Site map with the preceding information and I can enter it into SDMS later today.

Bob 5.6724

▼ Fw: San Jacinto: Info Needed for UAO Enforcement Record

Fw: San Jacinto: Info Needed for UAO Enforcement Record

Barbara to: Robert Werner Nann

09/29/2009 03:41 PM

Get attached document in SDMS and get me the ID#.

Barbara A. Nann Assistant Regional Counsel EPA Region 6 (6RC-S) 1445 Ross Avenue Dallas, TX 75202 phone: (214) 665-2157 fax: (214) 665-6460

fax: (214) 665-6460 nann.barbara@epa.gov

---- Forwarded by Barbara Nann/R6/USEPA/US on 09/29/2009 03:41 PM -----

Re: San Jacinto: Info Needed for UAO Enforcement Record ...

Jeff to: Stephen Tzhone

Danielson

09/29/2009 12:00 PM

Cc: Barbara Nann, David Parrish

Stephen,

Attached is a map of the sample locations within the preliminary perimeter that we have in the geodatabase. We have 3 sources for the sampling locations - the TMDL study, HRS/SSI report, and TXDOT - and they have been symbolize to differentiate between them. The years the samples were taken is included in the legend so as not to clutter up the map. We've also labeled each TMDL sample with the TEQ concentration. The TXDOT samples have a field named Toxic Equivalent but there are all 0's in the field and there is no TEQ field in the HRS/SSI tables. There are concentration values for TCDD, TCDF, OCDF,, but no TEQ values. Let me know if there is anything else you need.

Jeff



Preliminary_Perimeter_allSamples.pdf

Jeffery Danielson Lockheed Martin EPA Region 6 - GIS Support Team 214.665.8559 danielson.jeff@epa.gov

▼ Re: San Jacinto: Info Needed for UAO Enforcement Record

Re: San Jacinto: Info Needed for UAO Enforcement Record

Stephen to: Curry Jones, Barbara Nann, David Parrish, Jeff Danielson,
Robert Werner

09/23/2009
10:26 AM

Cc: Carlos Sanchez, Donald Williams, Charles Faultry

1) Curry: Can you expand on Barbara's question (see bolded below). Basically, what we're looking for is an interpretation of the TMDL data separate from the one provided by the PRPs. To my knowledge, the raw TMDL data is on the TCEQ website but the interpretation of that data (ie, the TMDL report) is not. Is 6WQ reviewing that report or have a draft copy of that report? If so, can it be marked as enforcement sensitive and transferred to 6SF? Thanks for any info.

- 2) David/Jeff: Please provide to myself and Barbara a map within the preliminary perimeter (blue boundary) that:
 - has all geodatabase sample points that sampled for dioxin.
 - the origin (ie, associated origin layer) of that sample point
 - the year that sample was taken
 - the analysis of that sample point (total TEQ number or non-detect) associated with that sample point

Feel free to designate shapes or colors for any of the above variables so the map do not appear too cluttered, thanks.

3) Barbara: go-> www.epa.gov/dioxin

Beyond the tox profiles, it doesn't seem like there's a specific threshold as far as other documents... and <u>all</u> documents on that website would outline the danger of dioxin in one form or another. Thus, I recommend either referencing that EPA website for the enforcement record or putting all the documents listed on that website in the enforcement record.

Stephen L. Tzhone Superfund Remedial Project Manager USEPA Region 6 (6SF-RA) 214.665.8409 tzhone.stephen@epa.gov

▼ Re: San Jacinto: Info Needed for UAO Enforcement Record

Re: San Jacinto: Info Needed for UAO Enforcement Record

Barbara to: Stephen Tzhone Nann

09/23/2009 09:29 AM Draft TMDL does not need to be part of the record if it has not been released. I am a bit confused bc the PRP Group in their Aug 11 presentation submitted a map with color marking the concentration levels of dioxins in the area surrounding the site. These color concentrations were based on TMDL numbers. Has there been released TMDL #s? I also need to ask David Parrish if he can take the data EPA has regarding dioxin readings in the areas surrounding the site and do a map with shows the relative dioxin concentrations at the site and the surrounding area. I need to have a better feel for what EPA does know of doixin in the area (this will help justify to a court why EPA is asking the parties to sample where we are).

For documents I need, I just need documents that outline the danger of dioxin (human and environment risks). I have the HRS already and will attach that to the enforcement record. EPA policy and guidance on dioxin would be helpful if it outlines the risks of exposure to dioxin. Hope that helps to clarify. I believe what Jon has submitted to me will help, but I am open to any and all documents you have regarding this issue.

Barbara A. Nann Assistant Regional Counsel EPA Region 6 (6RC-S) 1445 Ross Avenue Dallas, TX 75202 phone: (214) 665-2157 fax: (214) 665-6460 nann.barbara@epa.gov

▼ San Jacinto: Info Needed for UAO Enforcement Record

San Jacinto: Info Needed for UAO Enforcement Record

Tzhone

Stephen to: Philip Turner, Forsythe.Barry, jessica.white, Jon Rauscher, George Pettigrew, Jennifer Lyke, David Bary, Donn Walters, Barbara Nann

09/22/2009

Cc: Carlos Sanchez, Donald Williams

Hi All:

Please see below for roles/responsibilities on enforcement record:

- 1) Barbara: I need some clarification on documents. Do you mean the site specific HRS/SI Report (which is already in record), or the watershed TMDL report (which has not been officially released yet by TCEQ, but 6WQ may have a draft), or the complete EPA policy and guidance documents on dioxin (which can all be found here: www.epa.gov/dioxin)?
- 2) George, Jennifer: Please see Barbara's question (2) below and respond to myself and Barbara with the items.
- 3) Phil, Barry, John, Jessica: Are there other tox profiles used for risk assessment

besides CDC/ATSDR's? Maybe IRIS summaries or IRIS tox reviews (are they considered official tox profiles)? Anyway, please respond to myself and Barbara with those items related to Barbara's question (3) below. If none, or if other 'non-official' tox profiles exists, please respond with the information and indicate as such.

- 4) David, Donn: Please see Barbara's question (4) below and respond to myself and Barbara with any media/community items. If none, please indicate as such. Barbara: I'm assuming you are canvasing non-site specific articles? also, is there a time span for this search (ie, 1999 -> 2009)?
- 5) Phil: Please respond to myself and Barbara with the most current HH and eco conceptual risk models. Barbara: There's no baseline human health risk assessment as it's completion is part of the RI. However, we do have conceptual risk models for both human health and ecological, Phil will send.
- * Barbara: I received updated information on the bathymetric survey request; basically, we do not have any such survey data but GIS will do a search with USACE, TCEQ, NOAA, etc. to see if they do. Barry, Jessica: If you are aware of existing bathymetric survey data from your respective agencies, please respond to Jeff Danielson with that data or the point of contact for him to obtain that data, thanks.

All: Please respond with requested information (or indication of none) by Fri 9/25, any questions let me know, thanks.

Stephen L. Tzhone Superfund Remedial Project Manager USEPA Region 6 (6SF-RA) 214.665.8409 tzhone.stephen@epa.gov

▼ Technical Info Needed for UAO Enforcement Record

Technical Info Needed for UAO Enforcement Record

Barbara to: Stephen Tzhone, Carlos Sanchez, Philip Turner, Jon Rauscher 09/22/2009 Nann 03:14 PM

Cc: Robert Werner

Stephen:

For the UAO Enforcement record, I will need the following documents:

- (1) documents showing the dangers of dioxins and furans (COCs at the site)
- (2) ATSDR toxicological profile for dioxins and furans (COCs at the site)
- (3) Other toxicological profiles for dioxins and furans (COCs at the site)
- (4) Any Newspaper articles showing the impact that dioxins and furans has had on health
- (5) BHHRA (if one was done)

Also, I have asked Jon Rauscher to create an independent barymetric survey of the site to determine locations of potential dredge cut lines (I want to see if the survey submitted by the PRPs are accurate AND I need to ascertain if there are any dredge cut lines that have directly affected the 40 acre tract where the waste disposal facility was operating on).

I will need all of the listed above for the UAO Enforcement Record before proceeding with any enforcement action.

Barbara A. Nann Assistant Regional Counsel EPA Region 6 (6RC-S) 1445 Ross Avenue Dallas, TX 75202 phone: (214) 665-2157 fax: (214) 665-6460 nann.barbara@epa.gov